

JOHN GIORDANO
United States Attorney
DAVID V. SIMUNOVICH
Assistant United States Attorney
970 Broad Street, Suite 700
Newark, NJ 07102
Tel. (973) 645-2736
david.simunovich@usdoj.gov

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

Petitioner,

v.

RODERICK JEFFERSON,

Respondent.

Civil Action No. 25-1931

**PETITION FOR SUMMARY ENFORCEMENT OF
CIVIL INVESTIGATIVE DEMAND**

The United States of America, by and through John Giordano, United States Attorney (Assistant U.S. Attorney David V. Simunovich, appearing) petitions this Court for summary enforcement of Civil Investigative Demand No. NJ-2024-113 (the “CID”), issued to the Respondent Roderick Jefferson (“Respondent”). In support thereof, the United States alleges as follows:

1. The United States brings this proceeding pursuant to 31 U.S.C. § 3733(j)(1).
2. This Court has subject matter jurisdiction to enforce the CID under 28 U.S.C. §§ 1331 and 1345.

3. Venue is proper in this judicial district pursuant to 31 U.S.C. § 3733(j)(1) because Respondent may be “found” in this District. *See Declaration of AUSA David V. Simunovich (“Simunovich Decl.”) ¶ 3.*

4. The United States Attorney’s Office for the District of New Jersey is investigating whether an entity (the “Subject Borrower”) may have violated the False Claims Act by making, or causing to be made, false statements to obtain funds under the Paycheck Protection Program (“PPP”). *Id.* ¶ 4. We have reason to believe that Jefferson has personal knowledge of information relevant to the investigation into the Subject Borrower.

5. In connection with the investigation described above, on or about December 9, 2024, a duly-authorized official at the U.S. Attorney’s Office approved the CID. *Id.* ¶ 5 & Exhibit 1. The CID seeks Respondent’s oral testimony; it advises Respondent of his right to be accompanied by counsel, and describes the general purposes and primary area of focus for his testimony. *Id.*

6. On February 11, 2025, agents with the U.S. Small Business Administration, Office of Inspector General, personally served Jefferson with the CID. *Id.* ¶ 6.

7. The CID required Jefferson to provide testimony within 30 days of service, or March 13, 2025, at the U.S. Attorney’s Office in Newark, NJ. *Id.* ¶ 7. Though not required by statute, on February 14, 2025, the U.S. Attorney’s Office sent a letter to Jefferson advising him of his obligation to appear for his CID testimony and inviting him to contact the U.S. Attorney’s Office to “find a mutually

convenient date, time and location for this interview.” *Id.* ¶ 8, Exhibit 2.

Respondent did not appear on March 13, 2025 to provide his testimony. *Id.* Nor did he contact the Government to request an adjournment. *Id.* ¶ 9.

8. On March 13, 2025, this Office sent a letter to Respondent, via Federal Express overnight delivery, advising him that he had failed to appear for his interview and requesting that he contact the U.S. Attorney’s Office by March 17, 2025 to schedule an alternate date and time on which he would provide his testimony. *Id.* ¶ 10, Exhibit 3.

9. Respondent’s testimony is essential to the proper conduct and completion of Government’s legitimate law enforcement investigation. *Id.* ¶ 11. His failure to provide oral testimony in response to the CID has impeded, and continues to impede, the Government’s investigation. *Id.*

10. Based on this Petition, the brief in support, and the accompanying declaration, the United States respectfully submits that it has established grounds to summarily enforce the CID.

PRAYER FOR RELIEF

WHEREFORE, the United States respectfully prays:

- A. That the Court enter an order directing Respondent Roderick Jefferson to comply with the CID and provide his testimony within seven days of the order;
- B. That the Court grant the United States such other and further relief as is just and proper.

Dated: Newark, New Jersey
March 18, 2025

Respectfully submitted,

JOHN GIORDANO
United States Attorney

By: /s/ David V. Simunovich
DAVID V. SIMUNOVICH
Assistant United States Attorney